

Date: Jan 06 2023

United States District Court
NORTHERN DISTRICT OF GEORGIA

KEVIN P. WEIMER, Clerk

By: Nicole Jenkins
Deputy Clerk

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

Kristopher Kneubuhler

Case Number: 1:23-MJ-027

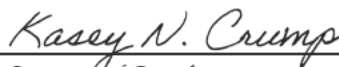
I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. From on or about April 16, 2022 and continuing through on or about January 5, 2023 in Fulton County, in the Northern District of Georgia, the defendant did receive and possess visual depictions of minors engaging in sexually explicit conduct

in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(a)(4)(B).

I further state that I am a Special Agent of Homeland Security Investigations and that this complaint is based on the following facts:

PLEASE SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof. Yes

Signature of Complainant
Kasey N. Crump

Based upon this complaint, this Court finds that there is probable cause to believe that an offense has been committed and that the defendant has committed it. Sworn to me by telephone pursuant to Federal Rule of Criminal Procedure 4.1.

January 6, 2023

Date

at Atlanta, Georgia

City and State

CATHERINE M. SALINAS

UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer

AUSA Theodore S. Hertzberg / 2023R00012 /

theodore.hertzberg@usdoj.gov



Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Kasey Crump, Special Agent, Homeland Security Investigations (“HSI”), Atlanta, Georgia, hereby depose and state the following under penalty of perjury:

1. I submit this affidavit in support of a criminal complaint authorizing the arrest of Kristopher KNEUBUHLER for violations of 18 U.S.C. § 2252 (certain activities relating to material involving the sexual exploitation of minors).

2. I have been employed as an HSI Special Agent (“SA”) since May 2020, and I am currently assigned to the Atlanta, Georgia, office. While employed by HSI, I have investigated federal criminal violations related to cybercrime, network intrusions, child exploitation, and child pornography. I have received training in child pornography, child exploitation, money laundering, fraud schemes, network intrusions, and cryptocurrency. I completed the Criminal Investigator Training Program and HSI Special Agent Training at the Federal Law Enforcement Training Center in Brunswick, Georgia. Moreover, I am a federal law enforcement officer who is engaged in enforcing federal criminal laws, including 18 U.S.C. § 2252 et seq., and I am authorized by law to request a search warrant.

3. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included details of every aspect or each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause for the issuance of the complaint. I make this affidavit based on personal knowledge and on the basis of information received from other law enforcement officers and/or agents.

PROBABLE CAUSE

4. On August 19, 2022, I received information from cryptocurrency exchange Coinbase Global, Inc. that Kristopher KNEUBUHLER appeared to have purchased access to child sexual abuse material (“CSAM”) through the Darkweb. Specifically, according to Coinbase, KNEUBUHLER sent 0.00218690 Bitcoin from a Bitcoin wallet to Bitcoin address

bc1qxa0fd9rgffznkv4l6qk8k7qn8v3e07c7jdvkw7 (the “CSAM Bitcoin Address”) on April 16, 2022.

5. Coinbase had been alerted to the existence of the CSAM Bitcoin Address by the Internet Watch Foundation (IWF), a non-profit organization that seeks to identify and remove online child sexual abuse imagery. IWF advised Coinbase that Darkweb URL hxxp://w5y5puc5ry6u2dmmljplid4rz4oenvqcv53iatbpvbbfag66rv5gnxtqd.onion (“the Darkweb Site”) was selling access to CSAM and that the CSAM Bitcoin Address was listed for customers to send money to for the purpose of purchasing access to CSAM. Coinbase subsequently notified HSI about KNEUBUHLER’s transaction.

6. In response to a subpoena, Coinbase disclosed subscriber information for the Bitcoin wallet from which .00218690 Bitcoin were sent to the CSAM Bitcoin Wallet on April 16, 2022 as set forth in Paragraph 4 above. KNEUBUHLER was the named subscriber at 300 Anchorage Place, Roswell, GA 30076. Coinbase also produced an image of KNEUBUHLER’s Georgia driver’s license that listed 300 Anchorage Place as KNEUBUHLER’s street address.

7. On December 28, 2022, a United States Magistrate Judge in the Northern District of Georgia issued a warrant authorizing a search of 300 Anchorage Place, Roswell, GA 30076. KNEUBUHLER was present at 300 Anchorage Place when HSI agents executed that warrant on January 5, 2023. KNEUBUHLER was not arrested while agents searched his home, and he agreed to talk to me and HSI SA Gabe Henson. KNEUBUHLER stated during the interview that he had purchased CSAM from the Darkweb Site, and he confirmed that he had sent funds to the Bitcoin CSAM Address. KNEUBUHLER further stated that he accessed the Darkweb Site multiple times and had downloaded CSAM material from the Darkweb Site a few days prior to execution of the search warrant. KNEUBUHLER stated that he knew the downloaded CSAM depicted minors and explained that he re-saved the CSAM onto a flash drive so it would not be on his computer.

8. During the search at KNEUBUHLER’s residence, HSI SAs found multiple devices containing CSAM. For example, use of a forensic software preview tool revealed approximately 30 images of CSAM on a laptop computer.

9. On January 6, 2023, I examined the CSAM images found during the on-scene preview of the laptop. Below are descriptions of three of those images:

- a. One image depicts a pre-pubescent female, approximately three to seven years old, laid on her back with no shirt on. An adult male is straddled over the female, who is touching the adult male's erect penis with her hand.
- b. Another image depicts a nude pre-pubescent female, approximately three to seven years old, on her hands and knees while an adult male penetrates her anus with his erect penis.
- c. Another image depicts a pre-pubescent female, approximately three to seven years old, laid out with her legs spread. The female's underwear is moved to the side to display her vagina, which is being penetrated by an adult male's erect penis.

10. Based on the foregoing, there is probable cause to believe that beginning on or about April 16, 2022, and continuing through on or about January 5, 2023, in the Northern District of Georgia, KNEUBUHLER did knowingly receive and possess visual depictions of minors engaging in sexually explicit conduct, in violation of 18 U.S.C. §§ 2252(a)(2) and 2252(a)(4)(B).